

#### 4.7.4.1.5.6 Application and Review Process/Review of the Permit Application/ Technical Review/Permit Application for New Facilities/ Other Permits/No-Discharge Permits

##### **Applicability:**

The intent of this topic is to assist the permit writer in understanding what to look for in the initial stages of review of an application for a new no-discharge permit.

##### **Content:**

For a no-discharge permit, you should receive completed permit application forms A, B, or B2, plus forms I and/or R. You should also receive the attachments to these forms, such as topographic maps, operation & maintenance plans, etc. With a new facility it is very important that you receive all of the attachments and that the applicant has completed all of the sections of the application that apply to their facility.

Critical information particular to no-discharge permits includes determining if the facility has adequate storage for wastewater or sludge, if applicable, and the land application rates. To determine if there is adequate storage capacity, the applicant must provide complete dimensions of the storage structure. Land application rates may be limited by a specific pollutant, Plant Available Nitrogen (PAN), or simply by hydraulic loading if neither pollutants nor PAN are of high enough levels to cause concern.

For determining the limiting factor in land application rates, the applicant must define what type of wastewater will be land applied. For domestic wastewater only, for example, low application rates are often based on hydraulic loading and high application rates are based on PAN. For facilities that will be handling industrial wastewater or sludge, the permittee should submit adequate analysis of the material (form R) so that a determination can be made regarding a limiting pollutant.

Even though a permit may be called no-discharge, emergency discharges are allowed from open storage structures such as an earthen basin under certain rainfall conditions. It is sometimes not possible to construct an enclosed storage structure due to sizing limitations, subjecting them to accumulating extra water during precipitation. While additional storage is required during construction to account for rainfall, there is a practical limit on this extra storage. For this reason, many no-discharge permits also have monitoring required during an emergency discharge event. Therefore, another critical portion of the application is adequate locational information so that you can determine what watershed may be impacted by possible discharges. If the applicant has not provided adequate information, an effort must be made to acquire the most specific information possible. Discharges from enclosed storage structures are not authorized during any precipitation event. It should be noted that a discharge from a storage structure that is not authorized by the permit is a violation, and must be reported as a bypass.

##### **Legal References:**

*Code of State Regulations:*

10 CSR 20-6.015.4      No-Discharge Permits - Permits

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